

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA, §
Plaintiff §
§
v. § Case No. 3:13-CR-00386-B
§
ANASTASIO N. LAOUTARIS, §
Defendant §

DEFENDANT'S SECOND WITNESS LIST

TO THE HONORABLE JANE BOYLE, UNITED STATES DISTRICT JUDGE:

COMES NOW the Defendant ANASTASIO N. LAOUTARIS and files this Defendant's Second Witness List as ordered in the Court's scheduling order. The following persons are probable and potential witnesses in this case, with a brief description as to their proposed testimonies.

<u>WITNESS NAME</u>	<u>PROBABLE/ POSSIBLE</u>	<u>TESTIMONY</u>
1. John Paradysz Houston, Texas	Probable	Fact / Custodial Testimony of Locke Lord computer network and issues; emails and communications about network problems and outages.
2. Kyle Metcalf Dallas, TX	Probable	Fact / Custodial Testimony of Locke Lord computer network and issues; emails and communications

			about network problems and outages.
3. Kenny Bradford	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network problems and outages. Remote log in; and IT Commandos.	
Dallas, Texas			
4. Jerry McEachern	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network problems and outages.	
Dallas, Texas			
5. Miles Holsworth	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network problems and outages.	
Dallas, Texas			
6. Joe Ramos	Probable	<u>Fact / custodial</u> Testimony of Locke Lord computer network about problems and outages. Defendant's employment.	
Houston, Texas			
7. Chris Grzadziel	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network and Laoutaris.	
Chicago, Illinois			
8. Stan Guzik	Probable	<u>Fact / Custodial</u>	

Chicago, Illinois		Testimony of Locke Lord computer network and issues; remote log in and communications about the network. Laoutaris' employment.
9. Michael Ger	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network issues. Laoutaris' employment.
Chicago, Illinois		
10. Anthony Le	Probable	<u>Expert</u> Expert testimony about computer networks, log in, network access, IP addresses, smurfing addresses, Log Me In, etc.
Houston, Texas		
11. Ross Cleveland	Probable	<u>Expert</u> Expert testimony about computer networks, log in, network access, IP addresses, smurfing addresses, Log Me In, etc.
Euless, Texas		
12. Custodian of Records/Rep.	Possible	<u>Fact / Custodial</u> The Planet – records and testimony about emails, screens, and IP addresses.
Dallas, Texas		
13. Custodian of Records/Rep.	Possible	<u>Fact / Custodial / Expert</u> Log Me In – records and testimony about Log Me In, remote access, screens, and IP addresses.
14. Retired Agent or Company Rep.	Possible	<u>Expert</u>

		Testimony about computer networks, attacks, infiltrations, compromises, etc.
15. Ernie Kohnke or Custodian/Rep. Probable		Custodial Testimony about Trafigura Trading records or lack thereof.
16. Custodian of Records	Possible	<u>Fact / Custodial</u> Softlayer Technologies records and responses to subpoena.

/s/ John Teakell
JOHN TEAKELL

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Defendant's Second Witness List was served on the U.S. Attorney's Office, Dallas, Texas, and all parties of record, on this 11th day of September, 2015.

/s/ John Teakell
JOHN R. TEAKELL